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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
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11 MICHAEL STEWART, an individual,
12 Plaintiff,

13 vs.

14 SOUNDMATTERS INTERNATIONAL, INC., a
15 Delaware corporation; SOUNDMATTERS ASIA,
16 INC., a Nevada corporation; GODEHARD
17 GUENTHER, an individual,
Defendants.

Case No.: 3:14-CV-00239-LRH-VPC

**STIPULATION AND ORDER TO
STAY CASE**

[SECOND REQUEST]

18 **STIPULATION**

19 Plaintiff Michael Stewart ("Plaintiff") and Defendants Soundmatters International, Inc.,
20 Soundmatters Asia, Inc., and Godehard Guenther by and through his estate (collectively
21 "Defendants"), by and through their respective counsel of record, hereby stipulate and agree as
22 follows:

23 1. A settlement conference was held between the parties on October 8, 2014, with
24 Magistrate Judge Cooke. No settlement was reached at the settlement conference.

25 2. The parties have recently re-commenced settlement negotiations and a draft
26 settlement agreement has been exchanged. The parties need additional time to finalize the terms
27 of the settlement agreement.
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1 3. The parties wish to avoid the expenditure of time and money on discovery and
2 related matters while they work on the terms of the settlement.

3 4. The Court previously granted one three (3) week stay for this action (Doc. No.
4 30).

5 5. The parties now wish to enter into a second stay as they continue to work on
6 finalizing a settlement agreement.

7 6. Accordingly, the parties request that the Court enter an order: (a) staying these
8 proceedings for an additional 30 days; (b) requiring the parties to submit a status report on the
9 date such stay expires; and (c) if the parties do not complete settlement within this period,
10 extending the discovery cutoff and remaining deadlines by 30 days.

11 7. Accordingly, the parties stipulate and respectfully request that this Court enter an
12 order staying this case and all associated deadlines for thirty (30) days, until **April 24, 2015**. The
13 parties will provide this Court with a status report on or before **April 24, 2015**.

14 8. The parties also stipulate and respectfully request that this Court take no action
15 on Defendants' motions to dismiss during the requested stay period. (*See* Doc. ##19-20).

16 9. This stipulation is made in good faith and not in an attempt to delay proceedings.

17 10. Nothing in this stipulation shall be deemed a waiver of any rights or remedies
18 belonging to any party hereto.

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IT IS SO STIPULATED:

Dated this 24th day of March, 2015.

Dated this 24th day of March, 2015.

By: /s/ Matthew D. Francis
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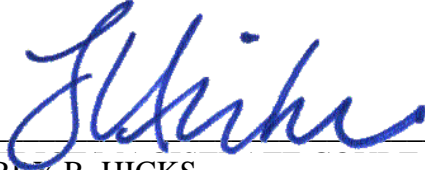
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Attorneys for Defendants

ORDER

IT IS SO ORDERED.

DATED this 30th day of March, 2015.



LARRY R. HICKS
UNITED STATES DISTRICT JUDGE